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July 22, 2021

BY ECF

The Honorable Judge Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

MEMO ENDORSED

RE: <u>United States v. Desirae Schneider</u> 20 Cr. 325 (SHS)

Dear Judge Stein:

I write to request a modification to Desirae Schneider's bail conditions in the above-captioned case to enable Ms. Schneider to travel in the Northern District of Illinois so that she may remain with her parents in Winnebago County, IL until her sentencing on September 30, 2021. Ms. Schneider further requests that her supervision be transferred to the Northern District of Illinois. Pretrial services and the Government do not object to this request.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On April 12, 2021, Ms. Schneider pled guilty to the one-count indictment and remained out on bond. On June 30, 2021, the Court held Ms. Schneider's sentencing hearing but has not yet imposed a sentence. The Court modified Ms. Schneider's conditions of release to include drug testing and treatment as directed by pretrial services. Ms. Schneider's sentencing is currently scheduled for September 30, 2021.

For the past 17 months, Ms. Schneider has remained in constant compliance with the conditions of her release.

On July 7, 2021, the Court endorsed Ms. Schneider's request to travel to Illinois and stay with her parents from Thursday, July 8, 2021 through Saturday, July 24, 2021. Ms. Schneider now respectfully requests a bail modification to allow Ms. Schneider to travel in the Northern District of Illinois so that she may remain with her parents in Winnebago County, IL until her sentencing on September 30, 2021. Ms. Schneider also requests, at the direction of pretrial services, that her pretrial supervision be transferred to the Northern District of Illinois. Pretrial services and the Government do not object to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Marne L. Lenox Assistant Federal Defender (212) 417-8721

HONORABLE SIDNEY H. STEIN

United States District Judge Dated: New York, New York July 22 2021

SO ORDEREI

cc: Rebecca Dell, Assistant U.S. Attorney Jonathan Lettieri, Pretrial Services Officer